

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ALTPASS LLC,

Plaintiff,

v.

VIVO COMMUNICATION
TECHNOLOGY CO. LTD.

Defendant.

CIVIL ACTION NO. 2-20-cv-00232

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION TO DISMISS WITH PREJUDICE

Plaintiff Altpass LLC ("Plaintiff"), pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby moves to dismiss **with prejudice** all claims by Plaintiff against Defendant Vivo Communication Technology Co. LTD ("Defendant"). Each party shall bear its own costs, expenses, and attorneys' fees.

DATED January 25, 2022

Respectfully submitted,

By: /s/ Hao Ni

Hao Ni

Texas Bar No. 24047205

hni@nilawfirm.com

NI, WANG & MASSAND, PLLC

8140 Walnut Hill Ln., Ste. 500

Dallas, TX 75231

Tel: (972) 331-4600

Fax: (972) 314-0900

ATTORNEY FOR PLAINTIFF

ALTPASS LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of January, 2022, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Hao Ni

Hao Ni